

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA	§	
	§	
v.	§	Case No. 3:18-CR-345-L
	§	
ANDREW BLAIR KASNETZ	§	

**DEFENDANT’S MOTION FOR LEAVE TO FILE
OBJECTIONS TO GOVERNMENT’S EXHIBIT LIST**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE SAM LINDSEY:

COMES NOW, Defendant, Andrew Kasnetz, through the undersigned counsel, making and filing this his *Motion for Leave to File Objections to Government’s Exhibit List* and, in support thereof, would respectfully show unto the Court the following:

1. For good cause, Defendant moves the Court for leave to file Defendant’s objections to the Government’s Exhibit List for the reasons that Defendant has been to great degree unable to participate in the defense of this case for the last several weeks due to having had several recent necessary surgeries (an ablation performed on February 15, 2022, rotator cuff repair on March 8, 2022, and hyperplasia on March 25, 2022) and associated post-operative pain, medication and recuperation. As further good cause, it was necessary for Defendant and Defendant’s counsel to review certain items identified by the Government on March 18, 2022 as the Government’s exhibits at the offices of the FBI as same have been identified as contraband. The necessities of the Government and Defendant’s counsel attendance – compounded by Defendant’s operative and post-operative situation and other trial preparation matters – required the coordinating of a number of complex and busy schedules and the defense was only able to review the “contraband” exhibits after the Court’s March 28, 2022 deadline on April 1, 2022.

2. Accordingly, Defendant moves the Court for leave to file its objections to the Government's exhibit list after the Court's deadline.

3. Defendant, by and through his undersigned counsel, would offer the following objections:

No.	Description	Reason
1-14, 16-17, 19, 21-34, 36-39, 41-47	Items seized / collected as fruit of Illegal Search (Motions for Suppression denied).	4 th Amendment
3-12, 32-34	Images & videos (alleged contraband) and screenshots of file structures (containing contraband).	R. 403 Unfair prejudice outweighs probative value.
4-13, 19, 21, 24, 27-34, 36-39, 42-47	Items seized / collected through forensic means.	R.s 602, 801 & 901 Personal knowledge, hearsay, and authentication.
37-39	Tax Documents & MBK Trust Agreement	R. 401 & 801 Relevance and hearsay.

WHEREFORE, PREMISES CONSIDERED, Defendant moves the Court for leave to file the Defendant's objections to the Government's exhibit list.

Respectfully submitted:

By: /s/ Jeffrey T. Hall
Jeffrey T. Hall
State Bar No. 00787622
jthallesq@gmail.com

1700 Pacific Avenue, Suite 4750
Dallas, Texas 75201

Telephone (214) 635-1839
Facsimile (855) 830-1952

**ATTORNEY FOR DEFENDANT
ANDREW BLAIR KASNETZ**

CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that a copy of the foregoing document was served by filing electronically, utilizing the CM/ECF system currently in operation by this Court, which CM/ECF system will automatically notify the assigned prosecutor at the United States Attorney's Office for the Northern District of Texas. The electronic case filing system will send a Notice of Electronic Filing to opposing counsel of record. Accordingly, this document was served, under the Federal Rules of Criminal Procedure, upon all parties or their counsel of record on April 7, 2022.

/s/ Jeffrey T. Hall
Jeffrey T. Hall